Minn-Iowa Christian Broadcasting, Inc.
P.O. Box 72
12089 380th Ave.
Blue Earth, MN 56013

September 15, 2017

Via Electronic Filing
Federal Communications Commission
Audio Division
445 12th Street SW
Washington, DC 20554

Re: Comments of Minn-Iowa Christian Broadcasting, Inc.
MB Docket No. 13-249 (Revitalization of the AM Radio Service)
MB Docket No. RM-11787 (National Association of Broadcasters Petition For Rulemaking)
MB Docket No. RM-11786 (Aztec Capital Partners, Inc. Petition for Rulemaking)

To Whom It May Concern:

These comments are submitted in the hopes that the Commission will consider them as part of their review of the current rules as they relate to FM translator interference.

By way of background, our non-profit Christian radio ministry, Minn-Iowa Christian Broadcasting, Inc (FRN# 0002636199) filed for and received construction permit BPFT-20160912AAB for Translator K253CH on September 26, 2016. We subsequently constructed this translator and received license BLFT-20170516ABW on May 25, 2017 to cover the CP for K253CH broadcasting on Channel 253.

Approximately 30 days later, we received email correspondence from University of Northwestern-St. Paul ("UNSP") complaining that our translator K253CH was causing interference to its primary input signal (KTIS-FM, Minneapolis, MN, Ch. 253) for its translator K299AL Albert Lea, MN. This began a series of in-field observation tests on our part to determine if there was interference and, if so, if it was our K253CH translator station that was at fault.

After a series of conversations and emails with UNSP, we voluntarily reduced our ERP in a series of steps from 250 to 200 to 100 to 80 to 50 and now 30 watts. Throughout this process, we maintain that the minimal interference caused to UNSP's K299AL is the result of temporary, atmospheric conditions that are common with the summer heat and humidity of our region.

It is our sense that the interference problem is not due to the previous or current operating parameters of our Hayfield, MN translator K253CH. Rather, the minor temporary and sporadic interruption of the primary input to K299AL is due to the atmospheric ducting conditions that further disrupts and exacerbates an anemic KTIS Channel 253 input signal already significantly stressed by intervening terrain and distance issues. The core of the problem is that UNSP is trying to feed its K299AL translator with a primary off-air signal that originates approximately 95 miles away in Shoreview, MN.

Meanwhile, our translator K253CH Hayfield, MN is broadcasting on Channel 253 a full 30 miles distance from the UNSP Albert Lea, MN translator K299AL. Accordingly, it does not seem likely that our Hayfield, MN translator broadcast signal should interfere with the K299AL primary input, particularly in light of our power reductions from our original 250 watts to our current 30 watts ERP.

Though the current FCC rules do provide unlimited geographic protection of the primary input for a translator, it is our contention that:

1. UNSP's interference complaint is unwarranted.
2. UNSP, in utilizing Channel 253 to feed its entire statewide translator network including its K299AL translator in Albert Lea, MN, is effectively denying the use of Channel 253 to any other broadcaster in almost the entire state of Minnesota. As such, the public interest is not being served to its maximum potential.

In light of this situation, we respectfully request that the FCC consider issuing a notice of proposed rulemaking seeking comments on limiting the geographic area in which an FM translator's input signal is protected from interference from other FM translators. Section 74.1203(a)(2) of the FCC's rules currently specifies that an FM translator will not be permitted to continue to operate if it causes any actual interference to the reception of the input signal of an FM translator. Our situation demonstrates the need to qualify this rule: licensees of FM translators should only be permitted to claim protection from interference to their input signal within a certain radius, such as a 50 to 60 dBu contour.

Alternatively, if the protection contour cannot be amended, we would like the FCC to consider amending the current rules to allow the primary input for all translators to be delivered by any means: Internet, satellite, microwave, or off-air. This would allow UNSP to feed its translator via the Internet and allow our translator K253CH to resume its duly authorized service levels.

Thank you for your time and consideration. Should you like clarification or more information, please feel free to call me at 507-525-1322 or email me at MattD@newmail.kinshipradio.org.

Sincerely,

Matt Dorfner
MICB, Inc., Executive Director